

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KAREN L. FINLEY,

Defendant.

No.

Judge

2:15CR148

SMITH

**GOVERNMENT'S PLEA AGREEMENT SUBMISSION**  
**OF ELEMENTS AND PENALTIES FOR**  
**18 U.S.C. §371**

I. ELEMENTS: 18 U.S.C. §371

- First: That the conspiracy described in the Information was knowingly and voluntarily formed, and was existing at or about the time alleged;
- Second: That said accused knowingly and voluntarily became a member of the conspiracy;
- Third: That at least one overt act was knowingly done in furtherance of some object or purpose of the conspiracy, as charged;
- Fourth: That such overt act was knowingly done by a member of the conspiracy during the course of its existence; and
- Fifth: That such conspiracy existed, in whole or in part, at or about the time alleged in the Southern District of Ohio.

2. PENALTIES

- A. Mandatory Minimum: None.
- B. Possible Maximum: 5 years in prison, a fine of \$250,000 or a fine of twice the pecuniary gain or loss pursuant to 18 U.S.C. § 3571(d), 3 years supervised release, and \$100 special assessment.

Respectfully submitted,

CARTER M. STEWART  
United States Attorney



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